

THIS CASE HAS NOT BEEN SET FOR ORAL ARGUMENT

**THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

No. 25-3041

UNITED STATES OF AMERICA,

Plaintiff/Appellee,

v.

DAN EDWIN WILSON,

Defendant/Appellant.

**APPELLANT’S UNOPPOSED MOTION TO EXTEND HIS BRIEFING
SCHEDULE DUE DATE BY TWO DAYS**

COMES NOW Appellant DAN EDWIN WILSON by and through undersigned counsel pursuant to Federal Rule of Appellate Procedure 27 and Circuit Rule 27, with consent from Daniel Lernerz of the US Attorney’s Office for the Government Appellee as party, and respectfully requests that this Court grant an extension of 2 days; changing the current opening Brief due date from November 3, 2025, (Order at Document #2140452) to November 5, 2025. His Joint Appendix is ready and can be filed as scheduled on November 3, 2025, or with the opening Brief. Mr. Wilson provides the following in support:

Mr. Wilson requires this 2-day extension because of unforeseen circumstances. On or about October 19, 2025, a deer ran out onto a country road and

into the passenger side of Ms. Stewart's vehicle as it was en route to a sporting event. After coordination with the insurance company for the claim and an estimate, she delivered the vehicle to the approved collision repair facility on October 27, 2025. They received the parts quickly and as part of completing and certifying the repair, took the vehicle for a test drive under diagnostic equipment analysis yesterday, October 30, 2025. Ms. Stewart received a call from the Deputy Sheriff late afternoon/early evening that the vehicle was in a crash with another vehicle during the test drive, with significant damage. Fortunately, there were no serious injuries to any persons.

Unexpected hours have now been required for calls from and in coordination with the responsible company and the county sheriff's office. Further unplanned and unexpected coordination is required through Monday November 3, 2025, such as with the insurance company for the vehicle that will likely be considered totaled due to structural damage. There are remaining tasks such as cancelling the toll pass affixed to the vehicle, and reacquiring the license plate, among other things that will extend through Monday November 3, 2025.

The impact is not only on Brief completion that was expected by tonight/tomorrow, but with final editing coordination between attorneys and scheduled paralegal work for the tables and document compilation. This late breaking situation could not have been foreseen and is not due to any fault by the undersigned.

WHEREFORE, because of the unforeseen circumstances that have drawn away time unexpectedly, with subsequent impacts on the schedules for the undersigned and the paralegal, the Appellant has shown good cause for an extension, where the ends of justice will be served without detriment to any party in allowing an extension so the Brief may be thoroughly and properly completed in support of Mr. Wilson with a revised due date of November 5, 2025.

October 31, 2025

/s/ Carolyn Stewart

Carolyn Stewart
Appellant's Attorney
Bar No. 64495
Stewart Country Law PA
1204 Swilley Rd.
Plant City, FL 33567
T: 813-659-5178
F: 813-365-3183
E: carolstewart_esq@protonmail.com

Respectfully signed,

/s/ George T. Pallas

George T. Pallas
Counsel for Dan Edwin Wilson
Bar No: 65943
GEORGE T. PALLAS, P.A
2420 Coral Way
Miami, FL 33145
305-856-8580
305-860-4828 FAX
george@pallaslaw.com

CERTIFICATE OF COMPLIANCE

1. I hereby certify that this motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) of the Federal Rules of Appellate Procedure. As measured by the undersigned's word-processing system used to prepare this motion, the motion contains 450 words.

2. This document complies with the type style requirements of Fed. R. App. P. 32(a)(6), because it has been prepared in a 14 point proportionally spaced roman style typeface (Times New Roman).

October 31, 2025

/s/ Carolyn Stewart
Carolyn Stewart
Appellant's Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court using CM/ECF system which will send notification of such filing.

October 31, 2025

Respectfully submitted,
/s/ Carolyn Stewart
Carolyn Stewart
Appellant's Attorney